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Attorneys for Defendant
PACIFIC GAS AND ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

CASE NO. CR-14-00175-TEH

DEFENDANT'S REVISED WITNESS LIST

Judge: Hon. Thelton Henderson

Pursuant to the Court's order on Motions *In Limine* (Dkt. 460), Defendant Pacific Gas & Electric Company hereby files its revised witness list. Consistent with the defendant's right to an effective defense, and in light of the government's late productions (*see* Dkt. 452), and the defendant's on-going review of these late-produced materials (*see* Dkt. 485), the defendant may supplement its witness list. Without acknowledging that any of the witnesses or subjects of testimony on the government's list are appropriate, the defendant may also call any witnesses identified on the government's witness list, depending on the government's presentation of its case. If a second trial phase on the government's Alternative Fines Act allegations becomes necessary, PG&E may add witnesses in response to the government's presentation.

<u>WITNESS NAME</u>	<u>SUMMARY OF TESTIMONY</u>
Zach Barrett	Director, State Programs, PHMSA. This witness is likely to testify about his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
David Berger	Principal, Cyclo Corporation. This witness is likely to testify regarding his work with the CPUC and DOJ, but his testimony will depend upon the government's presentation of its case.
Terry Boss	Senior Vice President of Environment, Safety and Operations, INGAA. This witness is likely to testify regarding his work with INGAA, but his testimony will depend upon the government's presentation of its case.
Richard Clark	Former Director, Consumer Products and Safety Division, CPUC. This witness is likely to testify regarding his work with the CPSD, but his testimony will depend upon the government's presentation of its case.
Linda Daugherty	Deputy Associate Administrator, Field Operations, PHMSA. This witness is likely to testify regarding her work at PHMSA, but her testimony will depend upon the government's presentation of its case.
Larry Deniston	Manager, Gas Regulatory Compliance, PG&E. This witness is likely to testify regarding his

WITNESS NAME	SUMMARY OF TESTIMONY
	communications with PG&E's regulators, but his testimony will depend upon the government's presentation of its case.
Maura Dunn	President, Trailblazer Consulting. This witness is likely to testify regarding her work regarding records and information management at PG&E, but her testimony will depend upon the government's presentation of its case.
Lisa Glazzy	Special Agent in Charge for Investigations, San Francisco Regional Office, Office of Inspector General, U.S. Department of Transportation. This witness is likely to testify regarding her investigation of this case, but her testimony will depend upon the government's presentation of its case.
Robert Hall	Director, Railroad, Pipeline and Hazardous Materials Investigations, NTSB. This witness likely will testify regarding his work as an NTSB pipeline investigator, but his testimony will depend upon the government's presentation of its case.
James Haggarty	Detective, San Bruno Police Department. This witness is likely to testify regarding his investigation of this case, but his testimony will depend upon the government's presentation of its case.
Gary Harpster	Director of Energy Projects, Overland Consulting. This witness is likely to testify regarding his work with the CPUC and DOJ, but his testimony will depend upon the government's presentation of its case.
Chris Hoidal	Director, Western Region Office, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Roger Huston	Senior Consultant, Cyclo Corporation. This witness likely will testify regarding his work at Cyclo, but his testimony will depend upon the government's presentation of its case.

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Mike Israni	Senior Technical Advisor, Standards & Rulemaking, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Blaine Keener	Director, Safety Data Systems & Analysis, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Donald Kramer	Metallurgist, NTSB. This witness likely will testify regarding his work at the NTSB, but his testimony will depend upon the government's presentation of its case.
Dennis Lee	Safety and Enforcement Division, CPUC. This witness likely will testify regarding his work for the SED and CPUC, but his testimony will depend upon the government's presentation of its case.
Wayne Lemoi	National Safety Coordinator, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Alan Mayberry	Director, Central Region Office, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Andrew McClymont	Staff, Cycla Corporation. This witness is likely to testify regarding his work with Cycla, but his testimony will depend upon the government's presentation of its case.
Chris McLaren	Transmission Specialist, State Programs, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Cynthia Quarterman	Former Director of Minerals Management Service and Administrator, PHMSA. This witness likely will testify regarding her work at PHMSA, but her testimony will depend upon the government's

WITNESS NAME	SUMMARY OF TESTIMONY
	presentation of its case.
Sunil Shori	Safety and Enforcement Division, CPUC. This witness likely will testify regarding his work for the SED and CPUC and his role in the NTSB investigation, but his testimony will depend upon the government's presentation of its case.
Raffy Stepanian	Safety and Enforcement Division, CPUC. This witness likely will testify regarding his work for the SED and CPUC, but his testimony will depend upon the government's presentation of its case.
Steve Stout	President, Cycla Corporation. This witness is likely to testify regarding his work with Cycla, but his testimony will depend upon the government's presentation of its case.
Julia Valentine	Former Agency Spokesperson, PHMSA. This witness likely will testify regarding her work at PHMSA, but her testimony will depend upon the government's presentation of its case.
Lawrence White	Attorney, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Jeff Wiese	Associate Administrator, PHMSA. This witness likely will testify regarding his work at PHMSA, but his testimony will depend upon the government's presentation of its case.
Expert witnesses	To be disclosed after the government complies with its Rule 16 disclosure obligations and once the scope of testimony, if any, of government expert witnesses is determined.
NTSB Custodian of Records	This witness's testimony will depend upon the government's presentation of its case.
PHMSA Custodian of Records	This witness's testimony will depend upon the government's presentation of its case.

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CPUC Custodian of Records	This witness's testimony will depend upon the government's presentation of its case.
Summary witness regarding pressure test records	PG&E. This witness's testimony will depend upon the government's presentation of its case.
Any other person the government subpoenaed, interviewed, or put before the grand jury	The identities of these witnesses and their testimony will depend upon the government's presentation of its case.

Dated: April 25, 2016

Respectfully submitted,

By _____/s/
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